

RECEIVED

IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA

2022 MAR 11 A 9:58

DEBRA P. HACKETT, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

Ledarrus J. Ollison #2068972

Eastern Correctional Facility

Full name and prison name of  
Plaintiff(s)

CIVIL ACTION NO. 2:22-cv-126

(To be supplied by Clerk of U.S. District  
Court)

LT. Boyd, CAPT. Jenkins  
SGT. Lovejoy, OFFICER  
SPANN, OFFICER JACKSON,  
OFFICER MASSEY, AND  
LT. McCovery

Name of person(s) who violated your  
constitutional rights. (List the names  
of all the person.)

I. PREVIOUS LAWSUITS

Have you begun other lawsuits in state or federal court dealing with the same or  
similar facts involved in this action? YES ☐ No ☒

B. Have you begun other lawsuits in state or federal court relating to your  
imprisonment? YES ☐ NO ☒

C. If your answer to A or B is yes, describe each lawsuit in the space below. (If there  
is more than one lawsuit, describe the additional lawsuits on another piece of paper,  
using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff(s)

Defendant(s)

2. Court (if federal court, name the district; if state court, name the county)

3. Docket number \_\_\_\_\_
4. Name of judge to whom case was assigned \_\_\_\_\_
5. Disposition (for example: was the case dismissed? Was it appealed? Is it still pending?) \_\_\_\_\_
6. Approximate date of filing lawsuit \_\_\_\_\_
7. Approximate date of disposition \_\_\_\_\_

II. PLACE OF PRESENT CONFINEMENT Easterling Correctional Facility  
Facility Limestone Correctional Facility  
 PLACE OR INSTITUTION WHERE INCIDENT OCCURRED Easterling  
Correctional Facility

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

	NAME	ADDRESS
1.	LT. K. Boyd	200 WALLACE Drive
2.	SGT. D. LOVEJOY	200 WALLACE Drive
3.	OFFICER. S. SPANN	200 WALLACE Drive
4.	OFFICER. L. JACKSON	200 WALLACE Drive
5.	OFFICER. MASSEY	200 WALLACE Drive
6.	LT. McCovey	200 Wallace Drive

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED December 9,  
2021

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: UNNECESSARY "Excessive" Force ON  
ME For Malicious, Sadistic Reasons TO CAUSE  
ME PAIN AND SUFFERING.

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place and manner and person involved.)

ON DECEMBER 9, 2021 AT ABOUT 9:00PM TO 10:00PM  
The Surveillance Cameras up in B-DORM ON 1 side  
will show, The Following Officers I have listed coming down  
TIER, AND "I" inmate leave the cell shirtless ~~and~~ AND TO  
only come back with Bandages & Bruises From Head to Toe.

GROUND TWO: The 8th Amendment of the United States  
Constitution to be Free From Cruel and  
UNUSUAL Punishment.

SUPPORTING FACTS: The Medical cameras will show AS My  
Body charts; Me Having Bruises, Cuts, Burns and Gashes  
All over My Body and The Nurses Cleaning Me up.  
The Defendants who are listed, were all deliberately  
indifferent towards My 8th Amendment as they all  
Participated in the Harmful acts done to me cause me pain

GROUND THREE: UNNECESSARY USE OF Force Violated My  
Rights in the Above Grounds AS well.

SUPPORTING FACTS: UNNECESSARY USE OF Excessive Force WAS  
Used ON Me while in Restraints when I WAS  
Pepper Sprayed AND Not decontaminated in Medical at  
A Eyewash Station. I was clearly in Pain, AND The  
Defendant LT. Boyd Snatched Me by the Leg IRONS  
AND Started Dragging Me on the concrete pavement by my  
Feet AND Shackles causing concrete Burns, Scratches  
gashes, Bruises AND Swelling all over Me; My Face, chest,  
Shoulders, BACK AND Legs. Calling Me a "Dumb Bitch ASS  
Nigga." Defendants all refuse to protect Me From these  
Violent Attacks By LT. Boyd AND even helped Him Condone it  
AND Participated in these excessive UNNECESSARY USE OF  
Force ON Me, which served NO Penological Interests.

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU. MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

Wherefore I Request you to order a Trial by Jury and Award punitive Damages against all defendants in their Individual Capacities in the amount of \$ 100,000 one Hundred Thousand Dollars!

Leatrice J. Allison #268972  
Signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 12/15/2021  
(Date)

Leatrice J. Allison #268972  
Signature of plaintiff(s)

SWORN / AFFIRMED AND  
SUBSCRIBED BEFORE ME,

COMMISSION EXP.

Daryl Dwyer  
01/18/2026

pg 1 of 6

IN THE UNITED STATES DISTRICT COURT RECEIVED  
FOR THE MIDDLE DISTRICT OF ALABAMA

2022 MAR 11 A 9:58  
DEBRA P. HACKETT, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

Ledarrus J. Ollison

plaintiff,

v.

2:22-cv-126-with A-SMD  
CIVIL #

Lt. Boyd, Lt. McCoverly,  
Sgt. Lovejoy, OFFICER  
Spann, OFFICER Jackson  
OFFICER Massey defendants,

42 USC 1983  
Civil Rights Complaint.

Your Honor, MR. Ollison is appearing Pro Se, today in your  
most Honorable Court requesting that you allow me to proceed  
with this NOW FRIVOLOUS 1983 Civil Rights Complaint.

~~\* Claim #1 \*~~

unnecessary use of Force violated my  
Rights under the 8th Amendment of the United  
States Constitution to be free from cruel and unusual  
Punishment as defendants did deliberately use  
unnecessary "excessive" force on me for malicious,  
sadistic Reasons to cause me Pain and Suffering.

thd On or About December 9th 2021 I was trying to

Page 6 of 6

use the phone to call family member due to a death in my family.

#2) I was approved a phone call by Warden McCoy and Cpt. Goody and was on the door screaming for a phone the whole and shift while Sgt Lovejoy, Lt Boyd, Ms. Jackson and officer Spann was working from 2:00 PM to 9:00 PM but for some reason the segregation officers Mr. Spann and Ms. Jackson would not give me a reasonable amount of time to use the phone.

#3) I was very depressed, mad, upset and feeling suicidal and homicidal over the whole situation and could not even get mental health workers to come to the door to help me.

#4) I set a fire underneath my front cell door and really to this day am not exactly sure why, I blacked out and am on the mental health case load so don't know if I was trying to kill myself or what?!

#5) About 9:00 PM to 10:00 PM the Surveillance Camera up in B-Block on one side will show Lt Boyd, Lt. McCovey, Sgt. Lovejoy, Cpl Spann and Jackson coming down the Tier and Lt. Boyd opening my TRAY slot on my door and spraying a Fire Extinguisher all over me and in my face for no reason other than to retaliate against me and cause me pain and suffering!!!

pg 3 of 6

#6) This Lt. Boyd was calling me a "Stupid Nigger", "Fuck Boy" and saying he was gonna "Fuck me Around" as he left me in the cell for a minute or so unable to Breathe and see. I thought I was gonna die for real From no oxygen and Breathing in all that extinguisher spray.

#7) Lt. Boyd came to the cell door and told me to cuff up so I complied and submitted to the handcuffs and my door was opened.

#8) I was escorted to the B-Dorm lobby where a Surveillance camera is at and Sgt Lovejoy put shackles on my feet so tight I could not even walk. I said these cuffs and shackles are way to tight, I'm not resisting so what's up with this.

#9) At this time you can clearly see Officer Spann and Lovejoy snatch my Feet up From under me slamming me Face First into the concrete Floor of the lobby where the camera is at causing me excruciating Pain in my legs and Face.

#10) I was Violently snatched up to my Feet and dragged and escorted to the B-Dorm entrance Door and had my Face and Body slammed into the Front door on the way outside to go to medical with no shirt on.

#11) Once outside the door on the concrete walkway going towards medical the outside cameras will clearly



pg 4 of 6

show one of these defendants either Lovejoy, McCovey, Spann Jackson or Boyd snatching my leg Ions up From under me slaming me to the concrete ground and "ONE" of these defendants Pepper sprayed me all over for no reason on my face and body as "all" these defendants started punching me and kicking me while I was shackled and cuffed to the rear in a defenseless position screaming out in pain "please Stop" and "I'm Sorry"

#12) Sgt Boyd then started dragging me on the concrete floor by my Feet and shackles causing concrete Burns, scratches, gashes, Bruises and swelling all over me, my Face, Chest, Shoulders, Back and legs calling me a "dumb Nigger" and saying "you wanna Die" "I'm gonna kill you then Bitch"

#13) Defendants McCovey, Spann, Jackson and Lovejoy all refused to protect me From these violent attacks by Boyd and even helped him, condoned it, and participated in this excessive unnecessary use of Force on me for punitive reasons with secured no penilegical interests whatsoever!

#14) Boyd stopped dragging me on the concrete, told his staff to pick me up and carry me to medical. AT medical the nurses tried to stop the Bleeding on my wounds with Bandages and Gauze and Tape after they cleaned and documented my injuries.

#15) Video Surveillance in B-Dorm will clearly show



pg 5 of 6

me leaving shirtless with no Bandages on me anywhere but coming back with Bandages all over me. The medical cameras will show as will Body Chart me having Bruises, cuts, Burns and Casters all over my Body and nurses cleaning me up! I Feel like my Body Chart was Altered with so I've been requesting Another one and putting in Sick Calls Bcuse of the pain I'm in. I Feel like my Bones Are Broken From the Violent ASSAULT on me.

#16) UNNECESSARY use of excessive Force was used on me while in Restraints when I was pepper sprayed And not decontaminated in medical at a eye wash station. I was clearly left in pain to Burn deliberately by defendants for punitive Reasons with served no penological interests.

#17) Defendants Boyd, McCovery, Spann, Jackson and Lovejoy were all deliberately indifferent towards my 8th Amendment Rights under the United STATES Constitution To be Free From Cruel and unusual punishment as they all participated in the malicious, sadistic intentional harmful acts done to me to cause me pain and suffering, mental anguish, nightmares and depression. These said acts violated my Rights under the 8th Amendment not once, not twice, But three times.

#18) The Eleventh Circuit Court of Appeals held in

pg 6 of 6

in the Hendricks V. Kingsey or Kingsey V. Hendricks case 3 years ago and in Brent Jacoby V. Canier Cpt. McKee et al., Appl. # 20-11989-I (Reversal and Remand) MD ALABAMA # 2:19-CV-01067 that these said acts are not tolerated and unconstitutional. So therefore this applies to me also. Also see Jacoby V. Baldwin County (11th circuit 2018) (SDA 2012)

Wherefore I request you order a Trial by Jury and award Punitive Damages against all defendants in their individual capacities in the amount of \$100,000 one hundred thousand dollars.

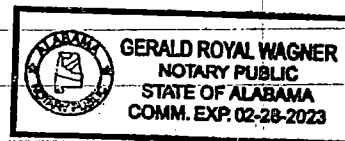
Attached as (Exhibit A) is sworn Declaration of Brent Jacoby

I declare under the penalty of perjury in telling the truth in this 1983 Action

Respectfully Submitted

Sign: X Declarant J. Allison #26897

Date: < 12/15/2021



edarrius J. Ollison #268972  
Limestone Correctional Facility  
28779 Nick Davis Rd.  
Harvest, AL 35749

This Correspondence is forwarded from  
an Alabama Department of Corrections  
have not been reviewed by the Alabama  
Department of Corrections and are not  
responsible for the substance or content  
of the enclosed communications

**LEGAL**  
**MAIL!!**

FIRST-CLASS



US POSTAGE IMPITNEY BOWES

ZIP 35749  
02 7H  
0001320273

**\$ 000.93<sup>0</sup>**  
MAR 03 2022

Ala. Supreme Court  
office of the clerk  
300 Dexter, Ave  
Montgomery, AL 36104

SUPREME COURT OF ALABAMA  
300 DEXTER AVENUE  
MONTGOMERY, ALABAMA 36104-3741

FIRST CLASS



US POSTAGE IMPITNEY BOWES



ZIP 36104 \$ 000.93<sup>0</sup>  
02 4W  
0000339197 MAR. 10. 2022

US MIDDLE DISTRICT OF ALABAMA  
CLERK'S OFFICE  
1 CHURCH STREET  
MONTGOMERY, ALABAMA 36104